UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

MELVIN DAVIS, WAYNE ANDERSON, SHAWNETTA JORDAN, and DAKOTA KING, individually and on behalf of all others similarly situated,

Case No. 2:20-cy-11060

Plaintiffs,

Hon. Nancy G. Edmunds

v.

MAGNA INTERNATIONAL OF AMERICA, INC., et al.,

Defendants.

JOINT STIPULATION TO EXTEND DISPOSITIVE MOTION BRIEFING DEADLINES

Plaintiffs and Defendants respectfully move the Court for an extension of the dispositive motion briefing deadlines in the Amended Scheduling Order entered on October 20, 2021 (ECF No. 41).

- The Court entered an Amended Scheduling Order on October 20, 2021
 (ECF No. 41). That order set the following deadlines:
 - Dispositive Motions (including summary judgment and class certification): March 3, 2022
 - Final Pretrial Order: June 16, 2022
 - Final Pretrial Conference: June 23, 2022 @ 2:00 p.m.

- Trial Date (Trailing): July 14, 2022
- 2. Consistent with that schedule, Defendants filed their motion for summary judgment on March 3, 2022, and Plaintiffs filed their motion for class certification the same day. Pursuant to Local Rule 7.1(e)(2), responses to those motions "must be filed within 21 days following service of the motion," and reply briefs "must be filed within 14 days after service of the response, but not less than 3 days before the motion hearing." As such, the remaining briefing on the dispositive motion would be subject to the following deadlines:
 - Responses to Dispositive Motions: March 24, 2022
 - Replies in Support of Dispositive Motions: April 7, 2022
- 3. The Parties now jointly request a 21-day extension of the remaining dispositive motion deadlines and jointly propose the following schedule:
 - Responses to Dispositive Motions: April 14, 2022
 - Replies in Support of Dispositive Motions: April 28, 2022

WHEREFORE, the parties respectfully request that the Court enter an order amending the schedule as set forth above.

Dated: March 16, 2022 Respectfully submitted,

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh
Mark B. Blocker
Gabrielle P. Kelerchian
Capozzi Adler, P.C.

By: /s/ Mark B. Blocker
Eric S. Mattson

312 Old Lancaster Road Caroline A. Wong M. Caroline Wood

Merion Station, PA 19066 Telephone: (610) 890-0200 Facsimile: (717) 233-4103 markg@capozziadler.com gabriellek@capozziadler.com

Donald Reavey Capozzi Adler, P.C. 2933 North Front Street Harrisburg, PA 17110 Telephone: (717) 233-4101 Facsimile: (717) 233-4103 donr@capozziadler.com

Counsel for Plaintiffs

Anthony L. DeLuca, MI Attorney Anthony L. Deluca, PLC 14950 East Jefferson Avenue, Suite 170 Gross Pointe Park, MI 48230 Telephone: (313) 821-5905 anthony@aldplc.com

Local Co-Counsel for Plaintiffs Pursuant to Local Rule 83.01(d) Sidley Austin LLP
One South Dearborn St.
Chicago, IL 60603
Telephone: (312) 853-7000
Facsimile: (312) 853-7036
mblocker@sidley.com
emattson@sidley.com
caroline.wong@sidley.com
cwood@sidley.com

Counsel for Defendants

Thomas G. McNeill, MI Attorney
Max A. Aidenbaum, MI Attorney
Dickinson Wright
500 Woodward Avenue, Suite 400
Detroit, MI 48226
Telephone: (313) 223-3500
Facsimile: (844) 670-6009
tmcneill@dickinsonwright.com
MAidenbaum@dickinson-wright.com

Local Co-Counsel for Defendants Pursuant to Local Rule 83.01(d)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

MELVIN DAVIS and DAKOTA)
KING, individually and on behalf	
of all others similarly situated,	CIVIL ACTION NO.:
Plaintiffs,	2:20-cv-11060
V.) Hon. Nancy G. Edmunds
MAGNA INTERNATIONAL OF))
AMERICA, INC., et al.)
)
Defendants.)

ORDER EXTENDING DISPOSITIVE MOTION BRIEFING DEADLINES

The Court has considered the Parties' joint motion for the entry of an Order extending the dispositive motion briefing deadlines in the Amended Scheduling Order entered on October 20, 2021 (ECF No. 41) and GRANTS the motion. The Court sets forth the following deadlines:

- Responses to Dispositive Motions (summary judgment and class certification): April 14, 2022
- Replies in Support of Dispositive Motions: April 28, 2022

Apart from amendment of these deadlines, the October 20, 2021 Scheduling Order shall remain in effect.

SO ORDERED.

s/ Nancy G. Edmunds NANCY G. EDMUNDS U.S. DISTRICT JUDGE

Dated: March 17, 2022